Exhibit 109

UNITED STAT	ES DISTRICT COURT	Page 1
SOUTHERN DI	STRICT OF NEW YORK	
)	
In re)	
)	
CUSTOMS AND TAX ADMINISTRATIO	N) MASTER DOCKET	
OF THE KINGDOM OF DENMARK) 18-MD-2865 (LAK)	
(SKATTEFORVALTNINGEN) TAX)	
REFUND SCHEME LITIGATION)	
)	
This document relates)	
To: All cases)	
)	

CONFIDENTIAL

VIDEO DEPOSITION OF LISBETH ROMER Copenhagen, Denmark Thursday, June 3, 2021 10:00 a.m. (CEST)

Taken at: Offices of Poul Schmith

Kammeradvokaten, Kalvebod Brygge 32, 1560 Copenhagen V, Denmark And WebEx via New York

Reported by: FREDERICK WEISS, CSR, CM

13 (Pages 46 to 49)

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Page 46
                                                                                                                Page 47
1
      it depended on what we did. If we sent it up in
                                                               1
                                                                     you had to go and investigate the bookkeeping of
2
      the head office, they would look into it.
                                                               2
                                                                     the company.
      Everything is depending on what we are observing
3
                                                               3
                                                                                    And we were not dressed for that.
4
      in our work for dividend tax.
                                                               4
                                                                     We were not educated to do that.
 5
                     But if I wanted a control
                                                               5
                                                                                    All right. So you had to send that
      investigation, I had to wait, if it was a decision
                                                                     out to another unit --
 6
                                                               6
                                                               7
7
      of whether or not it was in headquarters, and that
                                                                             A.
                                                                                    Yes.
8
      could go quite smoothly.
                                                               8
                                                                             Q.
                                                                                    -- called control?
9
      BY MS. MCCARTHY:
                                                               9
                                                                             A.
                                                                                    Yes
10
              Q.
                                                               10
                                                                                    0kay. And when you -- and how many
                      When you say a "control
11
      investigation" -
                                                               11
                                                                     times did you do that? Was that a frequent or
12
                                                              12
              A.
                     Yeah.
                                                                     rare occurrence?
13
              Q.
                      -- what do you mean?
                                                               13
                                                                             A.
                                                                                    It was -- we had good contacts.
14
              A.
                      That is you had to make an audit,
                                                               14
                                                                     And at one stage, we made them have a full -- a
                                                                     full survey of a certain year where they
15
      an audit.
                                                               15
                      An audit of the reclaim?
16
                                                               16
                                                                     investigated 68,000 companies, and found errors
                      I'm not thinking of reclaim.
17
              A.
                                                               17
                                                                     and payments in 20,000 of them.
18
      thinking more of the general dividend tax things.
                                                               18
                                                                             Q.
                                                                                    Okay. That's -- so that -- that's
19
              Q.
                      Can you give me an example of what
                                                               19
                                                                     one that you recall --
      you would use to do a controlled investigation of?
                                                              20
20
                                                                             A.
                                                                                    Yes.
21
                      For instance, you could declare one
                                                               21
                                                                             Q.
                                                                                     -- having them do?
22
      figure and you could tell the recipient had
                                                               22
                                                                             A.
23
                                                              23
      received another figure. And if we -- if we, by
                                                                             Q.
                                                                                    How about individual shareholder
                                                                     issues? Did you send those to control?
24
      chance, because we couldn't see it right away, but
                                                              24
25
      by chance we could see something was wrong, then
                                                              25
                                                                                    MR. WEINSTEIN: Objection to form.
                                                 Page 48
                                                                                                                Page 49
                                                                                     Is it fair to say that since the
1
      What individual shareholder issues are you
                                                                1
2
                                                               2
                                                                     mid-2000s, you had concerns that SKAT was issuing
      referring to?
      BY MS. MCCARTHY:
3
                                                               3
                                                                     refunds blindly?
                                                               4
4
              Q.
                      You may answer.
                                                                                     Blindly to some extent that we
5
              A.
                      We didn't have much chance by
                                                               5
                                                                     didn't have any registration of the shareholders,
6
      ourselves. Only to see it, we should stumble over
                                                               6
                                                                     but not blindly as we had this third-party
 7
      it if we should do something, and that was not
                                                               7
                                                                     declaration -- invoice from the banks.
8
                                                               8
      always the case.
                                                                                     So we felt that what we asked
9
                     And we had these piles of paper
                                                               9
                                                                     for -- for the person to claim a refund was
10
      that we were keving in, loads of paper.
                                                               10
                                                                     actually the Claimant, and then an invoice from
11
                     So it was -- it was not an audit
                                                               11
                                                                     the bank, they should tally, and then the
12
      group. It was a keying in group, and then a
                                                               12
                                                                     signature of the country saying, "This person or
13
      refund of dividend.
                                                               13
                                                                     this company is a taxpayer in this country."
14
                     But the main purpose of our office
                                                               14
                                                                             Q.
                                                                                     And you --
15
      was to have the declarations of the different
                                                              15
                                                                             A.
                                                                                     So we could see it was a
16
      companies put in place.
                                                              16
                                                                     double-treaty country that we were talking about.
                      The declarations of the dividends
17
                                                               17
                                                                                     And you just described the claim
18
      paid to shareholders?
                                                               18
                                                                     form --
19
                                                               19
                      Yes.
              A.
                                                                             A.
                                                                                     Yes.
20
              Q.
                      And that was so that you could make
                                                               20
                                                                             Q.
                                                                                     -- that foreign taxpayers would
21
      sure the proper amount of withholding tax was paid
                                                               21
                                                                     use --
22
      into SKAT, correct?
                                                               22
                                                                             A.
23
                                                               23
                                                                                     -- to claim a refund, correct?
              A.
                                                                             Q.
24
              Q.
                                                               24
                      Into the Danish treasury?
                                                                                     MR. WEINSTEIN: Objection to form.
                                                               25
25
              A.
                      Yes.
                                                                     She described more than just a claim form. She
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14 (Pages 50 to 53)

			14 (Pages 50 to 53)
	Page 50		Page 51
1	described a number of documents.	1	representations that were made
2	BY MS. MCCARTHY:	2	. A. Yes.
3	Q. The process you just described,	3	Q. — in documents provided to SKAT,
4	ma'am, is what is referred to as the form scheme,	4	correct?
5	correct?	5	A. Yes.
6	A. Yes.	6	Q. But was there any way for you to
7	Q. And I know that "scheme" is used	7	confirm the information provided to you by the
8	for other types of claims?	8	third parties?
9	A. Yes.	9	A. Then we should contact the bank to
10	Q. And that just means a program or a	10	have them certify it.
11	method, right?	11	Q. Did you do that?
12	A. Mm—Hmm.	12	A. We have done it, yeah.
13	Q. Yes?	13	Q. Was that a regular thing that you
14	A. Yeah.	14	did?
15	Q. It doesn't mean something negative?	15	A. No. No. Because as I told you,
16	A. No.	16	what we do with the banks is so important that we
17	Q. So when I use the word "scheme"	17	have to rely on them. And unless we immediately
18	today, I am not talking about something bad. I am	18	can see that this might not be correct, and of
19	just talking about a program, correct?	19	course banks do also make mistakes, and we they
20	A. Correct.	20	do things.
21	Q. Okay.	21	But then we can normally see it.
22	THE INTERPRETER: Correct.	22	If it doesn't look strange, we don't we don't
23	BY MS. MCCARTHY:	23	go to the bank.
24	Q. Okay. So you have said a few times	24	Q. Okay. And you said that you were
25	that you relied upon the third-party	25	getting lots and lots of paper, right, that had to
	Page 52		Page 53
1	be reviewed?	1	A. Correct.
2	A. Yes.	2	Q. Okay. Are you familiar with the
3	Q. And did that — did that workload	3	December 2017 report prepared by the law firm
4	increase over time?	4	Bech-Bruun?
5	A. Yes. Yes.	5	A. I have seen it.
6	Q. And your staffing did not increase?	6	Q. And that was a report into the
7	A. No.	7	circumstances regarding SKAT's payment of dividend
8	Q. So it's correct, is it not, that	8	tax refunds, right?
9	you had a concern that SKAT was paying reclaims	9	A. Yes.
10	that it should not have paid?	10	Q. And are you aware that the report
11	A. I didn't have the concern. I	11	has a specific section about you and the work that
12	didn't feel that it was happening. But I said	12	you did?
13	that there is a possibility that it might happen.	13	A. I have seen it, yes.
14	Q. So you recognized a risk, correct?	14	Q. And in fact, the report says things
15	A. I saw there could be a risk as we	15	like you were a driving force in focusing on the
16	depend on the banks.	16	problems in the dividend tax area?
17	Q. And is there any chance that your	17	A. Yes.
18	superiors within SKAT were unaware of that	18	MR. WEINSTEIN: Objection to form.
19	potential risk?	19	BY MS. MCCARTHY:
20	A. No.	20	Q. Do you agree with that
21	Q. In fact, you have said that it was	21	A. Yes.
Z I	written all over the wall in neon, correct?	22	Q statement?
			
22 23	A. Yes. Yes.	23	A. I do.
22 23	A. Yes. Yes.		
22	A. Yes. Yes.	23 24 25	

16 (Pages 58 to 61)

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Page 58
                                                                                                                Page 59
                                                                    BY MS. MCCARTHY:
1
                     (Court reporter clarification.)
                                                               1
2
                     THE WITNESS: Flew.
                                                               2
                                                                            Q.
                                                                                    Why did that happen? Why was your
                                                                    group disbanded?
3
              A.
                     It is not a certain amount that the
                                                               3
4
      company is giving out as dividend. It differs
                                                               4
                                                                             A.
                                                                                    Because --
5
      from year to year. And so it's rather difficult
                                                               5
                                                                                    MR. WEINSTEIN: Objection to form.
                                                                                    THE WITNESS:
6
      to know beforehand how much should we expect. If
                                                               6
7
      things are going well, you expect more. But you
                                                               7
                                                                             A.
                                                                                    -- when we started in 1970 with the
8
      are not certain which company is doing well or
                                                               8
                                                                    withholding tax system, a lot of people were
9
                                                               9
                                                                    employed, and many of those were still in my
      not.
10
                     And then we had the financial
                                                              10
11
      crisis, and Danish banks were not allowed to pay
                                                              11
                                                                                    So if they were employed in '70, in
12
      out dividends for some years. And of course, that
                                                              12
                                                                     '10 or a little after, they were supposedly going
13
      has an impact on all the dividends that we are
                                                              13
                                                                    home, be retired.
14
      talking about.
                                                              14
                                                                                    So they saw a chance of -- and we
                     It is -- you have to be very
                                                              15
                                                                    had -- we had installed a new keying-in system for
15
16
      interested in your work and to have a good nose
                                                              16
                                                                    the companies, so we didn't have these piles of
                                                                    paper anymore, everything was going into the
17
      for what is happening in society to be able to
                                                              17
18
      deal with this.
                                                              18
                                                                    machine by the company.
19
                     And I have said that I think -- I
                                                              19
                                                                                    So a lot of our tasks had
20
      really think that if the group of the good people
                                                              20
                                                                    disappeared. And so they said: "Go home. We are
21
      we were had been there, we would have discovered
                                                              21
                                                                    not starting a new one. We are not starting a new
22
      this fraud before. That is my point of view.
                                                              22
                                                                    group. "
23
                     But I was not there, and the others
                                                              23
                                                                                    And actually, the refund of
24
      were not there. There was only one left.
                                                              24
                                                                    dividend tax was almost the only task left as the
25
                                                              25
                                                                    companies now were doing the work we had done
                                                 Page 60
                                                                                                                Page 61
                                                                                    THE WITNESS:
1
      before by keying in the declaration and
                                                               1
2
                                                               2
                                                                             A.
                                                                                    I must say that we also managed to
      recipients.
3
                     (Court reporter clarification.)
                                                               3
                                                                    get a lot of things through. This keying-in
                     THE WITNESS: Recipients. Sorry.
4
                                                               4
                                                                    self-system was solving a lot of problems. Wow.
5
      BY MS. MCCARTHY:
                                                               5
                                                                    We got it made. And a lot of other things that
6
              Q.
                     What was Sven left to do then?
                                                               6
                                                                    were troubling our work, we also had changed into
7
              A.
                                                               7
                                                                    the better.
8
              Q.
                     So he had to still review the --
                                                               8
                                                                                    The forms, when we arrived, had one
9
      the applications, correct?
                                                               9
                                                                    page, and a second page where the tax authority of
10
              A.
                     Yes.
                                                              10
                                                                    the country where the recipient is living, on the
11
              Q.
                     And he was doing that all by
                                                              11
                                                                    second page. So you could switch the first page
12
      himself?
                                                              12
                                                                     and nobody would know.
13
                                                              13
                                                                                    So we made it all in one page, so
              A.
14
              Q.
                     Did he have a supervisor?
                                                              14
                                                                     it happens in one page.
15
              A.
                                                              15
                                                                                    I mean, small things, but we were
16
              Q.
                     Do you know who that was?
                                                              16
                                                                    trying to tighten up loopholes and -- and get rid
                                                                    of difficulties.
17
                     I'm not sure because there were
                                                              17
18
      several people involved. And I didn't follow when
                                                              18
                                                                            Q.
                                                                                    Mm-hmm.
19
      I left. I left. So I didn't know how the daily
                                                              19
                                                                             A.
                                                                                    And then, of course, when you have
20
      work was when I had gone.
                                                              20
                                                                     some victories, it's easier to continue than only
21
              Q.
                     So -- imagine that it was fairly
                                                              21
                                                                     if you had notes all the time.
22
      frustrating for you to raise the concerns that you
                                                              22
                                                                                    Right. When you testified before
23
      raised within SKAT and to not have -- not to be
                                                              23
                                                                     the Commission, you expressed your frustration
24
      taken seriously?
                                                              24
                                                                    about not being listened to by your superiors,
25
                                                              25
```

correct?

MR. WEINSTEIN: Objection to form.

21 (Pages 78 to 81)

			21 (Pages 78 to 81)
	Page 78		Page 79
1	listed companies give to SKAT regarding	1	BY MS. MCCARTHY:
2	shareholders?	2	Q. Is — and I was asking you if that
3	A. They don't do it. It is the	3	constituted then a gap in information to SKAT?
4	VP Securities that do it.	4	A. But it was as it had always been.
5	Q. All right. So is that a gap	5	It was as it has always been. Since the system
6	then	6	was put in place in the '80s, we didn't have any
7	A. No.	7	information about shareholders not having a depot
8	Q. in the information	8	in Denmark.
9	A. No.	9	Q. Okay. So that was something
10	Q that if you could let me	10	that that if SKAT then received a reclaim
11	finish the question.	11	application by a foreign shareholder without a
12	Because what I'm hearing is that if	12	Danish bank account, how could you verify their —
13	the shareholder has an account in a Danish bank,	13	that that shareholder received a dividend?
14	then VP Securities is able to report to SKAT what	14	A. I could only verify it by his claim
15	amount of dividend was given to a specific	15	and by the invoice from the bank telling that he
16	shareholder, correct?	16	had received that amount of dividend.
17	A. Correct.	17	Q. 0kay.
18	Q. However, if it's a foreign	18	MS. MCCARTHY: So if we could go to
19	shareholder without a Danish account and they	19	Exhibit 3051, if you could mark that,
20	invest in a listed company, that the listed	20	Mr. Reporter.
21	company does not provide the shareholder	21	3051 should be a form, Claim to
22	information to SKAT, correct?	22	Relief from Danish dividend Tax.
23	A. Correct.	23	Oh, I'm so sorry, it's 3016.
24	MR. WEINSTEIN: Objection to form.	24	apologize. I know, I sent you to I sent you to
25	III. III. III. 03,5000.011 to 10.1111	25	a very big document. I meant to send you to a
	Page 80		Page 81
1	very short document.	1	SKAT, correct?
2	(Exhibit 3016 marked for	2	A. Correct.
3	identification.)	3	Q. Okay. And so can you go over again
4	BY MS. MCCARTHY:	4	for us what the circumstances needed to be in
5	Q. Ms. Romer, do you see that	5	order for a shareholder to use this specific form?
6	document?	6	MR. WEINSTEIN: Objection to form.
7	A. Yes.	7	THE WITNESS:
8	Q. Do you recognize it?	8	A. Of course. The shareholder should
9	A. Yes.	9	be a shareholder who was a beneficial owner of the
10	Q. What is it?	10	shares at the time where the dividend was decided
11	A. It is the form to Claim Relief from	11	at the general assembly; and should be living in a
12	Danish Dividend Tax.	12	country with which Denmark had a double-taxation
13	Q. And is this was this form	13	treaty.
14	provided by SKAT in different languages?	14	And should be a taxpayer in the
15	A. Yes.	15	country that he was claiming he came from, as we
16	Q. And this is the English form,	16	had different tax percentages in different tax
17	correct?	17	double taxation agreements. It was also important
18	A. Yes.	18	that it was the right country that he claimed to
19	Q. Okay. And is this the form that	19	be taxpayer in.
20	you were talking about earlier today	20	BY MS. MCCARTHY:
21	A. Yes.	21	Q. Okay. And before approving a
22	Q. that a shareholder would fill	22	refund, SKAT would review the information provided
23	out when they were asking for	23	on this form, correct?
24	A. Refund.	24	A. Yes.
25	Q refund of the tax withheld by	25	Q. Okay. And who was the employee
	-		w. okay. And who was the emproyee

			22 (Pages 82 to 85)
	Page 82		Page 83
1	that worked with you who was responsible for	1	Q. Okay. And could Mr. Nielsen read
2	reviewing these forms?	2	English?
3	A. That was Mr. Sven that we talked	3	A. Yes.
4	about before.	4	Q. Okay. And SKAT paid refunds only
5	Q. Sven Nielsen?	5	if the information on the form was filled out,
6	A. Yes.	6	correct?
7	Q. N-I-E-L-S-E-N?	7	A. Yes.
8	A. Yes.	8	Q. And the required documentation was
9	Q. Okay. And was Mr. Nielsen always	9	attached?
10	the person responsible for reviewing this form?	10	A. Yes.
11	A. Yes.	11	Q. All right. Did SKAT do anything to
12	Q. In the entire time you worked in	12	verify the information on the forms?
13	Accounting II?	13	A. But that was the thing, that we had
14	A. Yes.	14	to rely on the information we got. You have the
15	Q. Was there anyone else that did	15	Claimant, and then you had the certification from
16	this?	16	the financial institution that the dividend was
17	A. Yes, there were people helping	17	paid to this person.
18	because the amount was increasing. And different	18	Q. Okay. So it was the best you
19	from the group helped him out with this.	19	could all you could do was rely on what was
20	Q. Did you ever review these and help	20	provided to SKAT?
21	him out?	21	A. Yes.
22	A. No. No.	22	MR. WEINSTEIN: Objection to form.
23	Q. But you were familiar with the	23	BY MS. MCCARTHY:
24	form?	24	Q. And if the information was
25	A. Yes.	25	completely filled out and the attaching documents
	Page 84		Page 85
1	were there	1	right?
2	A. Supporting.	2	A. Yeah.
3	Q supporting documents, then the	3	Q. Okay. If we can just go through
4	refund would be paid, correct?	4	the form quickly. The form says that the claim is
5	A. Yes.	5	made for refund of Danish dividend tax, and then
6	Q. And was this the same form that was	6	it gives the total Danish kroner being sought at
7	used from in the time that you were in	7	the very top, right?
8	Accounting II?	8	A. Yes.
9	A. We improved the form, as I told,	9	Q. Did the reviewers do anything to
10	that the certification from the tax authorities	10	independently verify the accuracy of the total
11	was on a separate page which we found was not so	11	Danish kroner amount?
12	clever. And therefore, we put it together so that	12	A. We calculated not always. That
13	it could all be in one page.	13	depended on the amount and the situation.
14	Q. And were you what was the	14	But we calculate it, of course, if
15	concern that you had by having the certification	15	they had calculated the right way and if they had
16	on a separate page?	16	used the right percentage from the double-taxation
17	A. You can substitute the first page.	17	treaty. And
18	(Court reporter clarification.)	18	Q. Okay. So it might depend upon the
19	THE WITNESS:	19	country?
20	A. You can substitute the first page	20	A. Yes.
	without the tax authorities knowing what you are	21	Q. And the agreement between
	michoac cho can adenor reros knowing what you are	22	Denmark
21	doing		Dormar N
21 22	doing. RY MS MCCARTHY		A Yes
21 22 23	BY MS. MCCARTHY:	23	A. Yes. Q and that country?
21 22	_		A. Yes.Q and that country?Are you familiar with the

			23 (Pages 86 to 89)
	Page 86		Page 87
1	double-taxation treaty between Denmark and the	1	effect, did you see any increase in pension plans
2	United States?	2	making reclaim applications?
3	A. I have fortunately forgotten,	3	A. Yes.
4	sorry.	4	Q. Was it a significant increase or
5	Q. Was there a time when you were	5	just a little bump?
6	familiar with it?	6	A. It was a significant increase. And
7	A. Yeah. When paragraph 10 was	7	I recall that this was new land for us, and we
8	introduced.	8	would make a lot of new pension schemes. And we
9	Q. Paragraph 10?	9	were curious, so we tried to look up the different
10	THE INTERPRETER: Section 10.	10	things.
11	THE WITNESS:	11	But yeah, when something new
12	A. Section 10 was introduced when the	12	happens, you try to get familiar with things. And
13	pension schemes in the States. I think it was in	13	that we did, and it was it was a lot of extra
14	'10 it was introduced.	14	work at that time.
15	BY MS. MCCARTHY:	15	Q. So when you say "we," who tried to
16	Q. Okay. Can you tell us about	16	look them up?
17	Section 10?	17	A. Those who were working with
18	A. Yes. But it was giving fully tax	18	refunds, Sven and his helpers.
19	exemption for pension schemes in the States.	19	Q. How many people did that entail?
20	Q. Do you know when that went into	20	A. I think there were two more than
21	effect?	21	Sven, two more, maybe three.
22	A . '10.	22	Q. And did you participate in this
23	Q . 2010?	23	research?
24	A. I think it was in '10.	24	A. We were always we were having a
25	Q. Okay. When Section 10 went into	25	lot of meetings talking about what we were doing,
	Page 88		Page 89
1		1	
1 2	so we were very familiar with what happened in our	1 2	Accounting II, correct?
1 2 3		2	Accounting II, correct? A. Yes.
2	so we were very familiar with what happened in our little group and following each other. So I was informed.		Accounting II, correct? A. Yes. Q. What other than other than
2 3	so we were very familiar with what happened in our little group and following each other. So I was informed.	2 3	Accounting II, correct? A. Yes. Q. What other than other than helping in this research or pension plans, what
2 3 4	so we were very familiar with what happened in our little group and following each other. So I was informed. Q. Okay. You were informed. But did	2 3 4	Accounting II, correct? A. Yes. Q. What other than other than
2 3 4 5	so we were very familiar with what happened in our little group and following each other. So I was informed. Q. Okay. You were informed. But did you participate in doing the research?	2 3 4 5	Accounting II, correct? A. Yes. Q. What other than other than helping in this research or pension plans, what were each of their roles? A. Oh, but they had different roles in
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	so we were very familiar with what happened in our little group and following each other. So I was informed. Q. Okay. You were informed. But did you participate in doing the research? A. No. Q. So it was Sven and maybe two other people? A. Maybe two or three other people, yes. Q. Do you know who the other two or three were? Do you remember? A. I remember the two of them. There was one called Bente. THE INTERPRETER: B-E-N-T-E. THE WITNESS: Fridberg. THE INTERPRETER: Last name, Fridberg, F-R-I-D-B-E-R-G. THE WITNESS: And I think Jette Hansen. THE INTERPRETER: And second, Jette, J-E-T-T-E, last name Hansen, H-A-N-S-E-N. BY MS. MCCARTHY:	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Accounting II, correct? A. Yes. Q. What other than other than helping in this research or pension plans, what were each of their roles? A. Oh, but they had different roles in all the paper, rekeying in all the documents that we had at that time. Q. Because this was before TastSelv went into effect, right? A. Yes. Yes. Q. So you were receiving paper in A. Lots of paper, lots of paper. Q. Did these dividend claim forms, did those continue to be submitted in paper by the time you retired? A. Yes. Q. Okay. Was there an effort to make these electronically available? A. No. We didn't have that on our agenda. Q. Okay. So this paper continued? A. Yes.

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			51 (Pages 198 to 20
	Page 198		Page 19
1	BY MS. MCCARTHY:	1	A. Yes.
2	Q. So the first — the first one that	2	Q. And then the next bullet point is:
3	I asked you to read, is it fair that it says that:	3	"There are no checks in connection with refund
4	"The dividend tax can be refunded before the tax	4	requests as to whether the investor is actually a
5	is paid or reported to SKAT." Right?	5	shareholder and whether the investor is, in fact,
6	A. Yes.	6	liable for tax in Denmark or not."
7	Q. Okay. And you agree with that	7	A. Yes.
8	finding, right?	8	Q. Do you agree with that?
9	A. Yes.	9	A. We only have the claim and the bank
10	Q. And the second one is: "The use of	10	statement.
11	omnibus accounts means that several dividend notes	11	Q. And then finally, it says: "It
12	are printed. "	12	does not appear that the previous investigations
13	•	13	initiated by SKAT have been followed up on."
	And then it says: "Swift messages	14	-
14	for a single share."		Do you agree with that?
15	(Court reporter clarification.)	15	A. Yes.
16	THE WITNESS:	16	Q. And was that a source of
17	A. Yes.	17	frustration for you?
18	BY MS. MCCARTHY:	18	A. Yes.
19	Q. There is no check as to whether	19	Q. And is that something that you
20	dividend tax is requested more than once per	20	spent a lot of time trying to get people to lister
21	share, right?	21	to these issues?
22	A. Yes.	22	A. Yes.
23	Q. And do you agree with that?	23	Q. Did you have any expectation that
24	A. That's possible.	24	after this audit, there would be any changes in
25	Q. So that's a possible risk?	25	implemented within the dividend process?
	Page 200		Page 20
1	A. Of course, the first one was	1	A. Yes, I think there was.
2	rectified, right?	2	Q. Did you participate in that working
3	Q. Mm—Hmm.	3	group?
4	A. So that was one.	4	A. If there was a working group, I
5	Q. Okay. And that was rectified when?	5	participated. But there were so many, and I can't
6	This is in 2009.	6	remember which one was which one. Sorry.
7	A. Wasn't it '12? I think it was.	7	Q. When you say there were so many
8	Q. Okay. So three years later?	8	working groups, can you give us a sense of how
9	A. Are we on '10?	9	many working groups you participated in?
10	Q. This is, right, 2010, two years	10	A. Every time we have any internal
11	later.		audit, we were making work in groups. And as
12		11	,
			we didn't have the power ourselves to do anything,
12	Q. Correct.	13	and as we were not the luckiest in tax to have
	A And the athene there	1.71	somebody to send it to, it took time and not many
14	A. And the others, there were no		a la companya a companya a manada a
14 15	that was what the Trace actually blocked that we	15	changes were made.
14 15 16	that was what the Trace actually blocked that we should do anything about it ourselves in Denmark,	15 16	So after the next audit we started
14 15 16 17	that was what the Trace actually blocked that we should do anything about it ourselves in Denmark, unfortunately.	15 16 17	So after the next audit we started a new working group with new people, because now
14 15 16 17 18	that was what the Trace actually blocked that we should do anything about it ourselves in Denmark, unfortunately. Q. Okay. So the other issues were	15 16 17 18	So after the next audit we started a new working group with new people, because now we had reorganized everything. So it was uphill.
14 15 16 17 18	that was what the Trace actually blocked that we should do anything about it ourselves in Denmark, unfortunately. Q. Okay. So the other issues were deferred —	15 16 17 18 19	So after the next audit we started a new working group with new people, because now we had reorganized everything. So it was uphill. But we tried, and we got something through,
14 15 16 17 18	that was what the Trace actually blocked that we should do anything about it ourselves in Denmark, unfortunately. Q. Okay. So the other issues were deferred — A. Yes.	15 16 17 18	So after the next audit we started a new working group with new people, because now we had reorganized everything. So it was uphill.
14 15 16 17 18 19 20 21	that was what the Trace actually blocked that we should do anything about it ourselves in Denmark, unfortunately. Q. Okay. So the other issues were deferred —	15 16 17 18 19	So after the next audit we started a new working group with new people, because now we had reorganized everything. So it was uphill. But we tried, and we got something through,
14 15 16 17 18 19 20 21	that was what the Trace actually blocked that we should do anything about it ourselves in Denmark, unfortunately. Q. Okay. So the other issues were deferred — A. Yes.	15 16 17 18 19 20	So after the next audit we started a new working group with new people, because now we had reorganized everything. So it was uphill. But we tried, and we got something through, eventually.
14 15 16 17 18 19 20 21	that was what the Trace actually blocked that we should do anything about it ourselves in Denmark, unfortunately. Q. Okay. So the other issues were deferred — A. Yes. Q. — for the passage of the Trace	15 16 17 18 19 20 21	So after the next audit we started a new working group with new people, because now we had reorganized everything. So it was uphill. But we tried, and we got something through, eventually. Q. In 2012, you got it changed —
13 14 15 16 17 18 19 20 21 22 23 24	that was what the Trace actually blocked that we should do anything about it ourselves in Denmark, unfortunately. Q. Okay. So the other issues were deferred A. Yes. Q for the passage of the Trace project?	15 16 17 18 19 20 21 22	So after the next audit we started a new working group with new people, because now we had reorganized everything. So it was uphill. But we tried, and we got something through, eventually. Q. In 2012, you got it changed — A. Yes.